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Attorneys for Defendant and Counterclaimant
ChipMOS Technologies, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Freescal Semiconductor, Inc., a
corporation,

Plaintiff,

vs.

ChipMOS Technologies, Inc., a
corporation,

Defendant.

AND RELATED COUNTERCLAIMS.

CASE NO. 5:09-CV-03689-JF-PSG

**STIPULATED REQUEST TO EXTEND
TIME TO EXCHANGE EXPERT
WITNESS DISCLOSURES AND
REPORTS; DECLARATION OF VIDYA R.
BHAKAR; [PROPOSED] ORDER**

JURY TRIAL DEMANDED

Pursuant to Local Rule 6-2, Plaintiff Freescale Semiconductor, Inc. ("Freescale") and Defendant ChipMOS Technologies, Inc. ("ChipMOS") jointly submit this Stipulated Request for an extension of one business day to exchange expert witness disclosures and reports pursuant to Federal Rule of Civil Procedure 26(a)(2).

The dates for the exchange of expert witness disclosures were set by the Court's Joint Scheduling Order filed April 1, 2011. Currently, the initial expert disclosures are due May 20, 2011, with rebuttal disclosures due on June 3, 2011. The parties have agreed to extend these dates by one business day each to May 23, 2011 and June 6, 2011, respectively.

This request for an extension is supported by the Declaration of Vidya R. Bhakar being filed herewith.

DATED: May 20, 2011

Respectfully submitted,

COOLEY LLP
RONALD S. LEMIEUX
VID R. BHAKAR
SHANÉE Y.W. NELSON

By: /s/ Vidya R. Bhakar

VIDYA R. BHAKAR

Attorneys for Defendant and Counterclaimant
ChipMOS Technologies, Inc.

In accordance with General Order No. 45, Section X(B), the above signatory attests that concurrence in the filing of this document has been obtained from the signatory below.

DATED: May 20, 2011

JONES DAY
GREG L. LIPPETZ
JACQUELINE K. S. LEE

By: /s/ Jacqueline K. S. Lee

JACQUELINE K. S. LEE

Attorneys for Plaintiff and Counterclaim-Defendant
Freescale Semiconductor, Inc.

DECLARATION OF VIDYA R. BHAKAR

I, Vidya R. Bhakar, declare

1. I am an attorney at the law firm of Cooley LLP, counsel in this action for Defendant and Counterclaimant ChipMOS Technologies, Inc. ("ChipMOS"). I have personal knowledge of the facts contained within this declaration, and if called as a witness, could testify competently to the matters contained herein.

2. The parties have conferred and agreed to an extension of time for exchange of initial and rebuttal expert disclosures pursuant to the schedule requested in this Stipulated Request.

3. There have been no previous modifications to the date for exchange of expert disclosures, and this change will not affect the schedule for the case.

4. The requested time modification will have no effect on any other deadlines set by the Court or on the schedule for this case.


I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on May 20, 2011 in Palo Alto, California.

/s/ Vidya R. Bhakar
Vidya R. Bhakar

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 6/8/11



Jeremy Fogel
United States District Judge